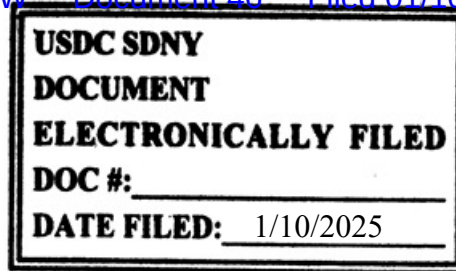




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January 9, 2025

VIA ELECTRONIC FILING

The Honorable Margaret M. Garnett
Thurgood Marshall United States Courthouse
40 Foley Square
Courtroom 906
New York, New York 10007

Re: Violeta Vasquez DeMelendez v. Costco Wholesale Membership Inc. et al.
Case No.: 1:23-CV-04435-MMG

Dear Judge Garnett:

This firm represents defendants, Costco Wholesale Corporation also i/s/h as “Costco” and Costco Wholesale Membership, Inc. (collectively, “Costco”). We write to Your Honor to request extensions of the pre-trial deadlines as set forth below. This request is made jointly with plaintiff’s counsel, Jeffrey Antin of Antin, Ehrlich & Epstein, LLP.

I. Reason for the requests.

The parties request the adjournments and extensions due to delays in obtaining discovery and plaintiff’s treatment records, as well as scheduling difficulties. The parties are working to schedule the deposition of plaintiff’s daughter (who has power of attorney), for the last week of January, 2025. The parties continue to work together to advance the case, but respectfully request additional time.

II. Original dates and the new dates requested.

	<u>Current Deadline</u>	<u>Requested Deadline</u>
Fact Discovery	January 10, 2025	February 28, 2025
Status Conference	February 7, 2025	To a date chosen by Your Honor.
Expert Discovery	March 21, 2025	May 5, 2025

Roseland

Jersey City

Newark

New York

Cherry Hill

Philadelphia

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<i>Plaintiff's Expert Disclosures</i>	January 30, 2025	March 17, 2025
<i>Defendant's Expert Disclosures</i>	March 3, 2025	April 17, 2025

III. Number of previous requests for adjournment or extension.

This is the parties' first request for extensions and adjournments relating to the Civil Case Management Plan and Scheduling Order, dated September 16, 2024.

Your Honor granted the parties' request to extend deadlines set in an initial Scheduling Order issued by Judge Cronan. Following the Conference with Your Honor on September 4, 2024, and confirmation as to the power of attorney for Plaintiff, Your Honor issued a new Civil Case Management Plan and Scheduling Order.

IV. Consent by opposing counsel.

Plaintiff's counsel consents to the request and the instant request is made jointly.

V. Proposed Alternative Dates.

The proposed alternative dates and extensions are set forth above in the table included in Section II.

Respectfully submitted,



Samuel P. Quatromoni

CC: Jeffrey Antin, Esq.
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The proposed extensions to the discovery schedule outlined above are GRANTED. However, no further requests for extensions of the discovery schedule will be entertained absent a detailed recitation of the discovery undertaken to date and specific identification of the discovery that remains and why it has not been possible to complete that item of discovery by the new deadlines set forth above. Counsel should assume that further requests for extension are unlikely to be granted barring extraordinary circumstances.

The post-fact discovery conference will be held on Wednesday, March 26, 2025 at 9:30 a.m.

SO ORDERED. Date 1/10/2025


HON. MARGARET M. GARNETT
U.S. DISTRICT JUDGE